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15 *Attorneys for Plaintiff Catalystix Inc.*

16 **IN THE UNITED STATES DISTRICT COURT
17 DISTRICT OF NEVADA**

18 CATALYSTIX INC., a Nevada corporation,

19 Plaintiff,

20 v.

21 LEGACY CREATIVE INC., an Alberta
22 corporation, and ANDREA REINDL
23 MCLEAN, an individual,

24 Defendants.

25 Case No. 2:21-CV-01253-JCM-EJY

26 **STIPULATION AND
27 ORDER TO EXTEND BRIEFING
DEADLINES RELATED TO
DEFENDANTS' MOTION TO DISMISS
COMPLAINT**

28 **[SECOND REQUEST]**

29 Plaintiff Catalystix, Inc. ("Plaintiff") and Defendants Legacy Creative Inc. and Andrea Reindl
30 McLean (collectively, the "Defendants"), by and through their undersigned counsel, hereby move
31 pursuant to Fed. R. Civ. P. 6 and Local Rule LR IA 6-1, to extend the deadline for Plaintiff to file its
32 opposition to Defendants' Motion to Dismiss Complaint (ECF No. 12) (the "Motion") from November
33 5, 2021 to November 12, 2021 and to extend the deadline for Defendants to file their reply in support
34 of the Motion to December 1, 2021. This is the second request to extend the deadline to file the
35 opposition to the Motion and the first request to extend the reply deadline.

36 On October 8, 2021, Defendants filed the Motion. On October 22, 2021, the Court entered an

1 Order extending the deadline for Plaintiff to file an opposition to the Motion to November 5, 2021
2 (ECF No. 14). Plaintiff needs additional time to address the issues raised in the Motion, which include
3 jurisdictional issues. In light of the upcoming holidays, Defendants are requesting additional time to
4 file their reply brief. Moreover, the parties are also in the process of scheduling a formal mediation in
5 hopes of resolving this dispute. The parties do not oppose these additional extension requests. This
6 request is made in good faith and is not intended to unreasonably delay this matter.

7 Based on the foregoing, the parties respectfully request that this Court extend Plaintiff's
8 deadline to file its opposition to the Motion from November 5, 2021 to November 12, 2021 and to
9 extend Defendants' reply deadline to December 1, 2021.

10 DATED this 2nd day of November, 2021.

11 ARMSTRONG TEASDALE LLP

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13 By: /s/ Brandon P. Johansson
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DATED this 2nd day of November, 2021.

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16 Attorneys for Legacy Creative Inc. and Andrea
17 Reindl McLean

19
20 **ORDER**

21
22 **IT IS SO ORDERED.**

23
24 
25 UNITED STATES DISTRICT JUDGE

26
27 DATE: November 3, 2021
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